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Attorneys for Plaintiffs
OXANE "GYPSY" TAUB and GEORGE DAVIS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

OXANE "GYPSY" TAUB and GEORGE DAVIS, Plaintiffs, v. CITY AND COUNTY of SAN FRANCISCO, and SAN FRANCISCO POLICE DEPARTMENT, Defendants.) Case № 3:12-cv-05841-EMC (NJV))) **STIPULATED REQUEST TO STAY PROCEEDINGS AND TO DISMISS PLAINTIFF RUSSELL MILLS FROM THIS ACTION**)))))

WHEREAS the Parties attended a settlement conference on March 12, 2014, during which they discussed a proposal that may allow the Parties to settle this action;

WHEREAS the Parties need additional time to consider that settlement proposal;

WHEREAS, Magistrate Judge Vadas has agreed to continue to preside over any future settlement negotiations between the Parties;

WHEREAS Plaintiffs' motion for leave to file an amended complaint is currently due on March 31, 2014, with a hearing scheduled for May 8, 2014;

WHEREAS, a Case Management Conference is currently scheduled for May 8, 2014;

1 **WHEREAS**, Defendants agrees that Russell Mills has complied with his discovery
2 obligations, and therefore may be dismissed from this action according to the Court's Order
3 dated July 18, 2013;

4 The Parties do thereby **STIPULATE and AGREE** to stay all aspects of the
5 proceedings for 60 days, and to dismiss Russell Mills from this action. The Parties hereby
6 request that the Court enter the following Order.

8
9 **IT IS SO STIPULATED AND AGREED.**

10
11
12 Dated: March 13, 2014

13 _____
14 /s/ D. Gill Sperlein
15 D. GILL SPERLEIN
16 THE LAW OFFICE OF D. GILL SPERLEIN
17 Attorney for Plaintiffs Oxane Taub and George Davis

18 Dated: March 13, 2014

19 DENNIS J. HERRERA
20 City Attorney

21 By: /s/ Tara M. Steeley
22 TARA M. STEELEY

23 Attorneys for Defendants
24 CITY AND COUNTY OF SAN FRANCISCO,
25 SAN FRANCISCO POLICE DEPARTMENT

[PROPOSED] ORDER

The proceedings are hereby stayed for 60 days, during which time Magistrate Judge Vadas shall preside over any continued settlement negotiations.

Discovery is stayed for 60 days. Plaintiffs' deadline for filing a motion for leave to file a second amended complaint shall be extended to June 18, 2014, with that motion set for hearing on July 24, 2014 at 1:30 pm. The Case Management Conference is hereby continued to July 24, 2014 at 1:30 pm.

Russell Mills is hereby dismissed as a Plaintiff in this action.

IT IS SO ORDERED

Dated: 3/18/14

